Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL BATH COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

RESPONSE OF POSTAL SERVICE TO INTERROGATORY UPS/USPS-T34-30-33 REDIRECTED FROM WITNESS ROBINSON

The United States Postal Service hereby provides its response to the following interrogatory of the United Parcel Service: UPS/USPS-T34-33, filed on March 22, 2000. This interrogatory was redirected from witness Robinson.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 April 5, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM WITNESS ROBINSON)

UPS/USPS-T34-33. Using Delivery Confirmation data, provide separately the portion of FY1999 Priority Mail volume sent within:

- a. the one-day service area for Priority Mail that actually arrived:
 - (i) in one day;
 - (ii) in more than one day;
- b. the two-day service area for Priority Mail that actually arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- c. the three-day service area for Priority Mail that actually arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

The following service performance data is based on retail Delivery Confirmation transactions only for Quarter 4, FY 1999. Delivery Confirmation service was implemented on March 14, 1999; as a result service performance data for earlier periods is not available.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF UNITED PARCEL SERVICE (REDIRECTED FROM WITNESS ROBINSON)

(REDIRECTED FROM WITNESS ROBINSON)			
a.			
	(i)	89.9%	
	(ii)	10.1%	
b.	Servic	Service performance for the two-day service standard area is not computed	
	using Delivery Confirmation data. The following answer is for combined		
	overn	night in two days and two-day service standard area delivered within two	
	days.		
	(i)	83.4%	
	(ii)	This data is not available.	
	(iii)	16.6%	
C.			
	(i)	83.1%	
	(ii)	This data is not available.	
	(iii)	16.9%	

 $\mathbf{x}_{i}(\mathbf{x}_{i},\mathbf{y}_{i}) \in \mathbf{x}_{i}(\mathbf{x}_{i},\mathbf{y}_{i}) + \mathbf{x}_{i}(\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i}) + \mathbf{y}_{i}(\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}_{i},\mathbf{y}$

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 April 5, 2000